

MEL CARNAHAN
Governor



DAVID A. SHORR
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102

April 2, 1993

RECEIVED

APR 07 1993

RCOM SECTION

Ms. Dianne Huffman
U.S. EPA Region VII
726 Minnesota Avenue
Kansas City, Kansas

Dear Ms. Huffman:

The Missouri Department of Natural Resources (MDNR) Hazardous Waste Program (HWP) has received your comment letter dated January 19, 1993, concerning the draft Preliminary Assessment (PA) for Silvanus Products, Inc., Ste. Genevieve, Missouri. The MDNR is in general agreement with the contents of this comment letter, and has submitted a letter (see attachment) to Jacobs Engineering Group requesting that these comments be incorporated into the final PA report.

There is, however, one comment in your letter which the MDNR did not feel was appropriate for the RFA at this facility. This comment concerned sampling at point 'M' on figure F3 of the draft PA report. The MDNR did not feel that a sampling visit was appropriate for this location because the area in question is covered with concrete, and there was no physical evidence which indicated the likelihood of a release in this area. Your comment letter stated that:

"One of the three inlets to this system is located close to Area of Concern "A", and one inlet is located close to SWMU No. 2. Because of the proximity of the inlets to these areas, and when consideration is given to past hazardous waste management practices at this facility, EPA recommends some type of environmental sampling near the discharge point of this system."

According to observations made during the on-site Visual Site Inspection (VSI) at Silvanus, the MDNR and Terracon did not note any physical evidence which indicated a release from SWMU #2. In addition, the small hydraulically oil-stained area near the air compressor hose did not appear to be capable of creating a contamination problem at point "M." Finally, it would appear



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RCRA Records Center

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that any potential release to this area would not have impacted the soils in this area because of the concrete that exists at the bottom of the drainage area.

This project is a Federal Fiscal Year 1992 State/EPA Agreement (SEA) commitment, and the MDNR needs EPA guidance as soon as possible to complete this project. If there are any questions, or if you would like to reschedule the conference call that was originally scheduled for March 30, 1993, please contact me at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in blue ink, appearing to read "Gene Williams", is written over the typed name.

Gene A. Williams
Environmental Engineer

GW:ji

c: Mr. Dave Doyle, U.S. EPA Region VII
Mr. Bob Stewart, U.S. EPA Region VII

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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

P.O. Box 176 Jefferson City, MO 65102

April 1, 1993

Ms. Debra Cooper
Jacobs Engineering Group
10901 West 84th Terrace, Suite 210
Lenexa, KS 66214

Dear Ms. Cooper:

The Missouri Department of Natural Resources (MDNR) and the U.S. Environmental Protection Agency (EPA) Region VII have completed a coordinated review of the draft report entitled "Environmental Priorities Initiative Preliminary Assessment-Silvanus Products, Inc." (PA report) dated October of 1992. The following comments are being provided for incorporation into the final PA report.

COMMENTS:

1. Page ES-1, paragraph 4 discusses the "... RCRA-permitted hazardous waste storage area." Since this area was not permitted, please change to state that the area was an "interim status hazardous waste storage area." Also in the same paragraph, it states "Missouri Department of Natural Resources (MDNR) assigned Georgia-Pacific's Missouri generator ID number to Silvanus, pending approved closure of the permitted area." Please delete this sentence because the area was never a "permitted area." In addition, the MDNR assigned Georgia-Pacific a generator number, but it is not "pending" on the closure of the unit.
- + 2. It should be mentioned that printing and silk screening of paper products occurred at the Silvanus facility. This should be discussed in the executive summary as well as the main body of the report. Sections of the report where this should be mentioned include page ES-1, paragraph 3; page 2, section 2.3, paragraph 1; and page 3, section 2.4, paragraph 1.
- 100 3. A series of figures showing the history of building configurations and building entrance and exit points would be beneficial in identifying past waste management areas that are now covered over with concrete, new building



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expansions, etc. If possible, please include in the final report.

4. Page ES-1, paragraph 5 states that four groundwater wells are located ". . . within one-quarter mile south of the site and downgradient." It is not clear whether the word downgradient refers to the fact that the wells are located downstream in relation to the Mississippi River, or whether it refers to downgradient in the sense that they are located hydrogeologically downgradient. If they are located hydrogeologically downgradient from the Silvanus site, what information is this based on? Please clarify.
5. Page 2, section 2.2, paragraph 1 discusses the dimensions of the Silvanus site. The report states that the site measures ". . . 264 feet, east to west, at the north end" According to figure 3 in the appendix of the report, the east to west dimension is approximately 264 feet at the widest point, not the northern most limit of the site. Please clarify the discrepancy.
6. Page 2, section 2.2, paragraph 2, first sentence: the term "downgradient" is usually used to refer to the direction of groundwater flow. It would be more appropriate to delete this term from the text, and replace it with the term "down" or "downward."
7. Page 3, section 2.4.1, paragraph 1, fourth sentence: the reference to the solid waste management unit (SWMU) #5 should be changed to SWMU #6.
8. Page 4, section 2.4.1, paragraph 4: the report states that during an 18-month period Silvanus purchased 3,757 pounds of lead for the production of linotype slugs, and that 3,460 pounds of lead were recycled. Since the report has presented these quantities of lead, it should expand on the usage and management of lead by Silvanus. For instance, the difference in the amount of lead purchased and the amount recycled could represent: 1) linotype slugs that are produced and retained by the facility, 2) a consequence of the 18-month time period selected, or 3) the generation of a significant quantity of waste lead, the management of which should be addressed in the PA report.
9. Page 5, section 2.5, paragraph 4, second sentence: reference 30 does not appear to be the correct reference for the information presented in this sentence.
10. Page 6, section 2.5, paragraph 6, first sentence:

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reference 35 does not appear to be the correct reference for the information presented in this sentence.

11. Page 6, section 3.1, paragraph 1 and figure F-1: It is stated that the four municipal water supply wells are located within a distance of one-quarter mile of the facility. The water wells that are Mr. Roger Wood mentioned in the report could be located very close to the Silvanus facility, and the report should state the location more precisely. At a minimum, the locations of the municipal water supply wells should be shown on figure F-1.

The report also states that the four water supply wells operated by the city of Ste. Genevieve are downgradient of the site. The report should clarify what is meant by the term "downgradient" (see comment #6 above).

12. Page 6, section 3.1, paragraph 2 discusses the MDNR's computerized database. Please mention that this database is administered by MDNR's Division of Geology and Land Survey (DGLS). In addition, it would be beneficial to note that the indicated water wells were completed in unconsolidated materials.
13. Page 7, section 3.3, description of the Karst Plain contains a typographic error in the third sentence.
14. Page 7, section 3.1, paragraph 3 discusses wastewater issues. According to our records, the city lagoons were destroyed by a flood in 1986 and are no longer in existence. The oxidation ditch is located closer to town. Please clarify.
15. Page 10, section 4.1: Urban Klein's name is spelled wrong.
16. Table 2, SWMU #1: descriptions of the nature and quantity by weight of the wastes managed at this SWMU should be clarified. For example, the PA report states in table 2 that the storage area held drums containing "waste solvent and ink-stained rags" (under heading SWMU Description), while it also states that the drums held "cleaning solvents and printer inks" (under heading Wastes Managed).
17. Table 2, SWMU #2: the separate summary of recommendations included with the PA report recommended that Silvanus provide secondary containment for this SWMU. There exists the possibility of a release occurring from the drums since the drums are exposed through the chain-link fence surrounding the SWMU (photo #7), and access to the site is

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not controlled (page 2, section 2.2 of the PA report). This recommendation should be emphasized in the separate conclusions and recommendations included with the PA report.

18. Table 2 and table 3: when appropriate, EPA Hazardous Waste Identification numbers should be used.
19. Table 2, SWMU #4 and #5: several issues should be resolved concerning past and present waste management practices at these SWMU's. These issues include the following:
 - A. Descriptions of the nature and quantity by weight of the wastes managed at these SWMU's should be clarified. For example, the PA report states in table 2 that the drums are used to accumulate "contaminated cleaning rags" (under heading SWMU Name), while it also states that the wastes managed are "cleaning solvents and printer inks" (under heading Waste Managed). On page 3 of the PA report (section 2.4.1, paragraph 2) it is stated that excess ink is placed in the drum.
 - B. Table 2 of the PA report states that full drums of waste from SWMU's #4 and #5 are generated every six months; however, two Hazardous Waste Manifest forms and a log, included in Appendix G of the PA report, indicate the generation of 822 pounds of this waste during the period from March 17, 1992, through April 30, 1992, a period of approximately six weeks (assuming removal of all previously accumulated waste on March 17, 1992). The weight of the wastes (two drums weighing 657 pounds removed on April 30, 1992) indicate the likelihood of a substantial quantity of liquid wastes being managed with SWMU's #4 and #5. Further, the Safety-Kleen pre-qualification evaluation for the "waste rags" describes the physical state of the waste as a "paste" (appendix H of the PA report). The PA report should clarify the physical nature of the wastestreams managed with these SWMU's.
 - C. Table 2 of the PA report states that SWMU's #4 and #5 began operation in 1992, and that prior to 1992 these wastes were disposed as part of the "general refuse wastestream." The PA report should address the management and disposal of this waste prior to 1992, including the location of the disposal area for the "general refuse wastestream."
 - D. Silvanus should determine the chemical composition of

any liquid wastes managed at SWMU's #4 and #5, since some inks can contain toxic substances.

20. Table 2, SWMU Number 6: this SWMU acts as a collection point for several sources of waste photographic fixer and developer solutions. EPA has noted several issues that should be resolved with respect to the wastes managed with SWMU #6. These issues include the following:

- A. The Safety-Kleen Pre-Qualification Evaluation for this waste (included in Appendix H of the PA Report) classified the waste as RCRA D001 (ignitable) due to "oil." It is important to note that photographic fixer solutions typically become "spent" when the silver content exceeds from 2 to 6 grams/liter, or at even greater concentrations if ammonium thiosulfate is used in the solution (as is the case at Silvanus; see Safety-Kleen, Mr. Roger Wood Pre-Qualification waste analysis for the waste fixer/developer solution in PA Report Appendix H). The report should recommend that Silvanus adequately determine the chemical composition of its waste fixer/developer solutions, since waste photographic fixer may contain high concentrations of silver, which is a RCRA hazardous waste (D011) at concentrations greater than 5 mg/l (40 CFR §261.24).
- B. In Table 2 of the PA Report, the dates of operation of this SWMU are listed as 1992 to present. Until the end of 1991 this waste was discharged to the sanitary sewer. In summarizing past waste disposal practices, the PA should determine if Silvanus notified the operators of the wastewater treatment plant of this practice.

21. Table 2, SWMU #7 & #8: the waste produced by the parts washers is petroleum naphtha, RCRA hazardous waste D001 (ignitability). In Table 2 of the PA report, it is stated that the dates of operation for these SWMU's were 1992 to present, and that prior to 1992 these wastes were disposed as part of the "general refuse wastestream." The PA report should discuss the past waste management practices of the spent petroleum naphtha, including the location of the disposal area for the "general refuse wastestream."

22. General Comment: The former location of the incinerator is a SWMU and should be addressed as such in the report.

23. General Comments: The primary concern with the Silvanus facility is with past hazardous waste management practices as detailed in the preceding comments. Questionable

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hazardous waste management and disposal has apparently occurred, and since the facility has been in continuous operation since 1927 it should be determined how and where potentially large volumes of hazardous wastes were disposed.

24. The PA Report states in section 2.4.2 on page 4 that vinyl and paper scrap is sent to the county landfill; it should be determined if this constitutes the disposal practice for the "general refuse wastestream" referred to for the waste petroleum naphtha and the waste cleaning rags and ink.
25. Approximately one third of the photographs presented in Appendix B are not referenced in the text. If applicable, please reference as many photographs as possible in the text.
26. EPA/MDNR concurs with the Summary of Recommendations that were included in the PA Report except for the recommendation for soil sampling at AOC A. EPA does not believe this recommendation is appropriate as it is not known if the oil is a hazardous waste or contains hazardous constituents. The recommendation should be changed to first determine the composition of the oil. The facility may be able to obtain this information from the manufacturer of oil.
27. It appears that another solid waste management unit (SWMU) exists at the site that was not discussed in the report. The dumpster at the rear of the building near the loading dock should be classified as a SWMU.

The EPA/MDNR appreciated the opportunity to work with you on the draft PA report. If there are any questions or comments, please contact me at (314) 751-7266.

Sincerely,

HAZARDOUS WASTE PROGRAM



Gene A. Williams
Environmental Engineer

GAW:ji

c: Dianne Huffman, U.S. EPA, Region VII
Southeast Regional Office